

REMARKS

Claims 1-28 are pending. By this Amendment, claims 1 and 5 have been amended. No new matter has been added. In view of the foregoing amendments and the following Remarks, Applicant respectfully requests reconsideration and timely withdrawal of the pending rejections for the reasons discussed below.

Allowable Subject Matter

Applicant appreciates the allowance of claims 3, 8, 11-13, 16-18, 22-25, 27 and 28. For the reasons discussed below, Applicant submits that claims 1, 2, 4-7, 9, 10, 14, 15, 19-21 and 26 are also allowable.

Rejections Under 35 U.S.C. §102

Claims 1, 2, 4, 5 and 9 are rejected under 35 U.S.C. §102(e) as being anticipated by U. S. Patent No. 6,489,722 issued to Yoshida, *et al.* ("Yoshida"). For at least the following reasons, the rejection is respectfully traversed.

First, Applicant submits that Yoshida is not prior art to this application. Yoshida has a U.S. filing date of November 3, 2000 and the present application's effective filing date is April 29, 2000 because it claims priority to Korean Patent Application No. 2000-23101, which was filed in the Korean Patent Office on April 29, 2000. Therefore, Yoshida is not prior art to this application. A certified translation of the priority document (i.e., Korean Patent Application No. 2000-23101) will be provided as soon as possible.

Secondly, in the event that Sano is considered to be valid prior art to this application, Applicant respectfully submits that Yoshida at least fails to disclose a partition structure

comprising unit partitions, discontinuously formed on the first panel to partition the discharge space, wherein the unit partitions are parallel to the address electrodes and each of the unit partitions have auxiliary partitions extending from both ends of each unit partition, as recited in amended claim 1.

The paragraph abridging pages 2 and 3 of the Office Action states that the partition structure 291 (Figure 3B of Yoshida) may be considered discontinuous because there are gaps 33 separating them. Applicant respectfully disagrees because the partition structure 291 is not a unit partition. Instead, as shown in Figure 2, the partition 291 extends along a plurality of discharge cells.

In addition, as shown in Figures 1-11 the partition 291 fails to have auxiliary partitions extending from both ends of each partition unit. Instead, as shown in Figures 1-11, both ends of the partitions 291 fail to have any members extending therefrom.

For at least these reasons, Applicant submits that Yoshida at least fails to disclose a partition structure comprising unit partitions, discontinuously formed on the first panel to partition the discharge space, wherein the unit partitions are parallel to the address electrodes and each of the unit partitions have auxiliary partitions extending from both ends of each unit partition, as recited in amended claim 1. Thus, Yoshida fails to anticipate all the features of claim 1, as well as all the features of claim 2-4, which depend from claim 1.

In addition, Applicant submits that Yoshida at least fails to disclose a partition structure comprising unit partitions discontinuously formed on said first dielectric layer to partition a discharge space, the unit partitions being parallel to said address electrodes and each of the unit partitions having auxiliary partitions extending from both ends of each unit partition, as recited in claim 5.

As discussed above with regards to claim 1, as shown in Figures 1-11 the partition 291 fails to have auxiliary partitions extending from both ends of each partition unit. Instead, as shown in Figures 1-11, both ends of the partitions 291 fail to have any members extending therefrom. Thus, Applicant submits that Yoshida at least fails to disclose a partition structure comprising unit partitions, where each of the unit partitions have auxiliary partitions extending from both ends of each partition unit, as recited in claim 5.

For at least these reasons, Applicant submits that Yoshida fails to disclose all the features of Applicant's claim 5, as well as all the features of claims 6-9, which depend from claim 5. Thus, Yoshida fails to anticipate all the features of claims 5-9. It is respectfully requested that the rejection be withdrawn.

Claims 10, 14, 15, 19-21 and 26 are rejected under 35 U.S.C. §102(e) as being anticipated by U. S. Patent Application Publication No. US 2002/0021090 issued to Sano, *et al.* ("Sano"). For at least the following reasons, the rejection is respectfully traversed.

First, Applicant submits that Sano is not prior art to this application. Sano has a U.S. filing date of March 26, 2001 and the present application's effective filing date is April 29, 2000 because it claims priority to Korean Patent Application No. 2000-23101, which was filed in the Korean Patent Office on April 29, 2000. Therefore, Sano is not prior art to this application. A certified translation of the priority document (i.e., Korean Patent Application No. 2000-23101) will be provided as soon as possible.

Secondly, in the event that Sano is considered to be valid prior art to this application, Applicant submits that Sano at least fails to disclose unit partitions ..., wherein adjacent pairs of said unit partitions in a common row define a unit discharge space extending across a corresponding one of said electrodes, and adjacent ones of said unit partitions do not contact

each other, as recited in claims 10 and 21.

As shown in Figures 6(a) each of the partitions 29 of Sano defines a plurality of discharge cells 27. Thus, in the partition disclosed in Sano, adjacent pairs of unit partitions are in contact with each other.

For at least these reasons, Applicant submits that Sano fails to disclose all the features of claims 10 and 21. Thus, Sano fails to anticipate all the features disclosed in claims 10 and 21, as well as all the features disclosed in claims 14, 15, 19 and 20, which depend from claim 10, and all the features of claim 26, which depends from claim 21. It is respectfully requested that the rejection be withdrawn.

Rejections Under 35 U.S.C. §103

Claims 1, 4, 5 and 9 are rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No.5,967,872 issued to Betsui, *et al.* ("Betsui") in view of U. S. Patent No. 5,952,782 issued to Nanto, *et al.* ("Nanto"). For at least the following reasons, the rejection is respectfully traversed.

Applicant respectfully submits that the combination of Nanto and Betsui at least fails to disclose or suggest a base panel for use in a plasma display device, comprising ...a partition structure comprising unit partitions, wherein the unit partitions are discontinuously formed on said first panel to partition the discharge space, the unit partitions being parallel to the address electrodes and each of the unit partitions having auxiliary partitions extending from both ends of each unit partition, as recited in amended claim 1. Applicant also respectfully submits that the combination of Nanto and Betsui at least fails to disclose or suggest a plasma display device

having a base panel having a partition structure, comprising ...a partition structure comprising unit partitions discontinuously formed on said first dielectric layer to partition a discharge space, the unit partitions being parallel to said address electrodes and each of the unit partitions having auxiliary partitions extending from both ends of each unit partition, as recited in amended claim 5.

Nowhere does Betsui or Nanto disclose or suggest unit partitions, where each of the unit partitions has auxiliary partitions extending from both ends of each unit partition, as recited in amended claims 1 and 5. Thus, for at least these reasons, Applicant submits that the combination of Betsui and Nanto fails to disclose or suggest all the features of claims 1 and 5.

Accordingly, the combination of Betsui and Nanto fails to render obvious the subject matter of claims 1 and 5, as well as all the features of claims 4 and 9, which depend from claims 1 and 5, respectively. It is respectfully requested that the rejection be withdrawn.

Claim 6 is rejected under 35 U.S.C. §103(a) as being unpatentable over Yoshida in view of Nanto. For at least the following reasons, the rejection is respectfully traversed.

As discussed above with regards to claim 1 and 5, Yoshida fails to disclose all the features of claims 5 and, in fact, Yoshida is not prior art to this application. Applicant submits that Nanto also fails to disclose a partition structure comprising unit partitions, where each of the unit partitions have auxiliary partitions extending from both ends of each partition unit, as recited in claim 5, from which claim 6 depends.

For at least these reasons, Applicant submits that the combination of Yoshida and Nanto fails to disclose or suggest all the features of claim 6. It is respectfully requested that the rejection be withdrawn.

Response to Reasons for Allowance:

While Applicant does not disagree with the Examiner's determination that the inventions recited in the claims are patentable over the references of record, Applicant objects to the Reasons for Allowance (RFA). Indeed, each of the claims in this application defines a separate invention, which recite different combinations of features, and the basis for patentability of each claim is based on the totality of features recited in each claim. While Applicant believes that the claims are allowable, Applicant does not acquiesce that patentability resides in each feature exactly as expressed in the claims, nor that each feature is required for patentability of each claim.

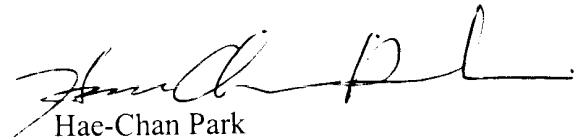
CONCLUSION

Applicant believes that a full and complete response has been made to the pending Office Action and respectfully submits that all of the stated objections and grounds for rejection have been overcome or rendered moot. Accordingly, Applicant respectfully submits that claims 1, 2, 4-7, 9, 10, 14, 15, 19-21, and 26 in addition to already allowed claims 3, 8, 11-13, 16-18, 22-25, 27 and 28, are also allowable and that the application is in condition for allowance.

Should the Examiner feel that there are any issues outstanding after consideration of this response, the Examiner is invited to contact the Applicant's undersigned attorney at the number below to expedite prosecution.

Prompt and favorable consideration of this Reply is respectfully requested.

Respectfully submitted,



Hae-Chan Park
Reg. No. 50,114

Date: September 8, 2003

Attachment: Petition for Extension of Time with Check No. 129782 (\$110)

McGuireWoods LLP
1750 Tysons Boulevard
Suite 1800
McLean, VA 22102-4215
Tel: 703-712-5365
Fax: 703-712-5280
HCP:MMI/bjb